

SEP 18 2018

Mr. Lawrence C. Rosen  
Environmental Operations, Inc  
1530 South Second Street, Suite 200  
St. Louis, Missouri 63104-4500

RE: Comments on the Corrective Measures Implementation Monitored Natural Attenuation Monitoring  
and Vapor Intrusion Work Plan dated August 31, 2018, for the former Solutia - J.F. Queeny Site,  
St. Louis, Missouri  
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 and Missouri Department of Natural Resources  
have completed their review of the subject document and are providing the following comments to be  
incorporated into a revised Work Plan to be submitted to the agencies within 30 days of the date of this  
letter.

1. Page iv: The third paragraph of the Executive Summary should also reference the Restrictive  
Covenant that is recorded for the majority of the site. The covenant should also be included as an  
appendix to the work plan.
2. The Groundwater Monitoring Plan and the Quality Assurance Project Plan should be revised to  
reflect any changes or updates that have occurred since their approval.

If you have any questions concerning this matter, please call me at (913) 551-7755.

Sincerely,

Bruce A. Morrison  
Project Manager  
RCRA Corrective Action and Permits Section  
Waste Remediation and Permitting Branch  
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR  
Stacy Hastie, SWH Investments  
Eric Page, EOI

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CONCURRENCES		
SYMBOL	WRAP	RCAP SC
NAME	Morrison	Roberts
INITIALS/DATE	BM 9-18-18	JS 9/18/18

RCRA 9/18/2018



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